



June 19, 2013

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, DC 20554

***Via Electronic Filing***

Re: **Ex-Parte Presentation in:**

WC Dkt. No. 11-10, *Modernizing the FCC Form 477 Data Program*

WC Dkt. No. 07-38, *Development of Nationwide Broadband Data*

WC Dkt. No. 08-190, *Service Quality, Customer Satisfaction and Data Gathering*

WC Dkt. No. 10-132, *Review of Wireline Competition Bureau Data Practices*

WT Dkt. No. 10-131, *Review of Wireless Telecommunications Bureau Data Practices*

WC Dkt. No. 10-175, *Free Press Request to Review Form 477 Data*

Dear Ms. Dortch:

The Open Technology Institute at New America Foundation respectfully submits this *ex-parte* letter to support the FCC's efforts to modernize FCC form 477 data collection and reporting.

As advisors to municipal governments and community organizations working on broadband distribution and digital inclusion, the Open Technology Institute (OTI) uses Form 477 data frequently. These data are a unique and indispensable tool for identifying geographic areas for outreach efforts as well as understanding the factors that contribute to low adoption of broadband services.

We use Form 477 data, specifically the Local Telephone Competition and Broadband Deployment data<sup>1</sup>, and Geographic Information Systems (GIS) to locate and analyze areas of low adoption. This allows us to advise cities and community-based organizations on where to place public computer centers, broadband resources, and digital literacy trainings. OTI uses the data everywhere we work, including in Detroit, Brooklyn, New Orleans, and San Francisco, to guide the development and distribution of community technology resources in neighborhoods with low broadband subscription rates. In Philadelphia, for example, we evaluated the City's placement of

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<sup>1</sup> <http://transition.fcc.gov/wcb/iatd/comp.html>



resources and services as part of the KEYSPOD Broadband Technology Opportunities Program (BTOP) project; that analysis can help the City determine which public computer centers to devote resources to after BTOP sunsets.

These data are also essential in documenting the long-term broadband subscription impacts of digital inclusion and broadband adoption programs, including BTOP and the FCC's own initiative, Connect2Compete. The FCC is the only agency that tracks and releases this information on a regular basis; private ISPs are unwilling to share subscription numbers (especially within geographic context). Form 477 data provide a valuable and reliable method to measure program outcomes.

While the 477 data is essential to our work and to our CBO and municipal partners' efforts, we are concerned that data at the relatively large census tract level are not fully sufficient for reliable analysis. In our experience, the most effective digital literacy and broadband interventions take place at the neighborhood level. With data only at the tract level, it is difficult to locate trainings and resources in very densely populated urban areas, where there may be a need for multiple points of service within a tract. In rural areas as well, low population density can skew an analysis, since a large tract will show up as "served" or with a large percentage of households subscribing, even if only one person in that tract has service. Data at the block group or block level would help both urban cities and rural communities use scarce resources more effectively.

Data at finer geographic scales and at greater specificity than percentages of households by quintiles, alongside data on pricing, would also enable cross-referencing with other data sets (Census and Bureau of Labor Statistics data, for example) in order to better understand patterns around low rates of access to digital and broadband services. This could help organizations and governments design more appropriate and sustainable training and outreach programs.

In order to enable social service and support organizations, as well as local and federal government agencies, to use resources more efficiently to reach and serve their target populations, we encourage the FCC to release Form 477 data with greater and more complete detail. In the absence of consideration of the needs we have articulated, we believe that the FCC should not make any determination about methods of data collection and release at this time.

The Open Technology Institute files this letter pursuant to Section 1.1206(b) of the Commission's rules, 47 C.F.R. §1.1206(b). Please contact the undersigned should you have any questions.



Respectfully submitted,

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cc: Chairwoman Mignon Clyburn  
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